

EXHIBIT A

From: petersjoan petersjoan@bellsouth.net

Subject: Re: Bonnell / Doe

Date: September 17, 2025 at 2:34 PM

To: Andrew Brettler abrettler@berkbrettler.com

Cc: Carlos A. Garcia Perez cgarcia@smgqlaw.com, Gustavo D. Lage glage@smgqlaw.com, Andrea Garcia agarcia2@gmail.com, Angie Velando angie@smgqlaw.com, Robert "Bob" L. Raskopf rraskopf@bilzin.com, Patricia M. Patino ppatino@bilzin.com, Jake Camara jcamara@berkbrettler.com, Joel Sichel jsichel@berkbrettler.com, Regina Peter rpeter@berkbrettler.com, Maria Favela mfavela@berkbrettler.com

Counsel:

The discovery cut-off date as per the Court's Scheduling Order is December 16th. With that in mind, we would appreciate if you could provide 3 available dates for the defendant to be deposed in Miami between October 22nd and November 19. Once we have agreed on a mutually available date, we will provide the notice of deposition.

thank you,
Joan

On Wednesday, September 17, 2025, 12:13:58 PM EDT, petersjoan <petersjoan@bellsouth.net> wrote:

Counsel:

We are in the process of reviewing your objections to Plaintiff's September 5th document production as set forth in your letter dated September 12, 2025. We will be submitting an Amended Response to Interrogatories as well as a supplemental document production on September 19th. After receiving, please advise as to whether you would still like to have a meet and confer regarding any remaining objections.

On a separate matter, we have been collecting, reviewing, and organizing documents responsive to your 12 requests for documents in your subpoena duces tecum on Lauren Hayden. This process has taken significantly longer than previously anticipated. We now anticipate being able to produce responsive non-privileged documents on or before September 26.

Regards,
Joan

On Friday, September 12, 2025, 06:50:54 PM EDT, Andrew Brettler <abrettler@berkbrettler.com> wrote:

Joan:

Mr. Bonnell could have responded haphazardly to the discovery requests you served and made an incomplete document production just as Plaintiff has done in response to the discovery demands we served. See attached letter.

Instead, Bonnell is complying with his discovery obligations and making a robust and timely document production. A link to download Bonnell's production will follow in separate email. Any delay in the "progress of this case" is of your own doing.

Finally, there was no threat in my last email. We will proceed accordingly.

Sincerely,

Andrew B. Brettler | BERK BRETTLER LLP
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